

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE:)	CASE NO: 24-40825
KIMBERLY ELLEN REINHARDT)	Chapter 13
)	
)	Trustee's Objection to Confirmation
)	Original Confirmation Hearing set for :
Debtor)	May 2, 2024 11:00 am

TRUSTEE'S OBJECTION TO CONFIRMATION OF 1ST AMENDED PLAN

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The attorney fees to be paid under paragraph 3.4 of the plan plus the attorney fees paid prior to the petition date exceed \$2,400.
2. The plan pays attorney fees in excess of that owed per the 2016(b) form.
3. Per Schedules I and J as filed, the Debtor does not have sufficient income to make the Chapter 13 plan payment.
4. Debtor testified that she will no longer receive child support in June; it is now July. Debtor should file an amended Schedule I to disclose current income. In addition, the Trustee requests a copy of 3 pay advices recently issued [May 15, 2024 through July 15, 2024] to Debtor from her job.
5. Regarding atty fees: filed documents show that Debtor's attorney received \$1,200 in fees prior to filing. Plan paragraph 3.4 provides for payment of \$1,237 in attorney fees. These amounts total \$2,437. Adding in plan paragraph 3.6 attorney fees of \$2,400, the plan pays \$4,837 in attorney fees. The attorney fee election form and Rule 2016(b) form show that Debtor's attorney agreed to accept \$4,800 in attorney fees. These objections have been pending since May.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: July 26, 2024

OBJCONF--JMP

/s/ Jennifer M. Pontus

Jennifer M. Pontus MO65660

Attorney for Trustee

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on July 26, 2024, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on July 26, 2024.

KIMBERLY ELLEN REINHARDT
673 WOODSTREAM DRIVE
SAINT CHARLES, MO 63304

/s/ Jennifer M. Pontus

Jennifer M. Pontus MO65660